

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

JANE UTAUS-VA DOE
Plaintiff

vs.

THE UNIVERSITY OF TEXAS
AT AUSTIN
Defendant

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C.A. No. 1:19-cv-01202-RP

PLAINTIFF’S RESPONSE TO DEFENDANT’S UNOPPOSED MOTION

COMES NOW, Plaintiff “**JANE UTAUS-VA DOE**” to file her “Plaintiff’s Original Complaint” as follows:

1. Pending before this Court is the following unopposed motion filed by Defendants:

**DEFENDANT’S UNOPPOSED MOTION FOR MORE
DEFINITE STATEMENT AND/OR OPPOSED MOTION TO
REQUIRE PLAINTIFF TO USE HER TRUE NAME**

(hereafter “Motion”) (*DKT #4*).

2. As stated in the Motion, counsel for the parties did discuss the relief requested in the Motion, and Plaintiff does not oppose the relief requested.

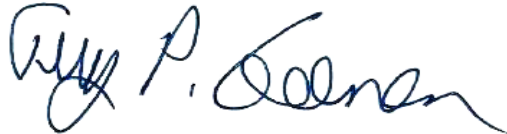
3. This Response is directed only to the attachment of Exhibit A to the Motion, being a list of cases where Plaintiff’s counsel has used assumed names for plaintiffs in other matters.

4. Missing from Defendant's use of Exhibit A and references thereto is that in over ninety percent (90%) of the cases referenced, the opposing defendants made no objection to maintaining the privacy of the plaintiffs' names. Nor does Defendant reference that in all but two of the cases where the defendant did object, the plaintiffs have voluntarily agreed to make their respective identities known. Just as in this matter with Plaintiff.

5. There is nothing nefarious about trying to protect a plaintiff's private medical information. When a defendant elects to require the identity of such plaintiff be known, such is a decision of the defendant which Plaintiff's counsel has elected to comply with.

Respectfully submitted,

Gorman Law Firm, pllc



By: _____

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ATTORNEYS FOR PLAINTIFF
JANE UTAUS-VA DOE

CERTIFICATE OF SERVICE

This is to certify that on this the 23rd day of March 2020, a true and correct copy of the above and foregoing was forwarded to all counsel of record in accordance with the Federal Rules of Civil Procedure utilizing the *VIA CM/ECF* filing system being:

SUMMER R. LEE

Assistant Attorney General

General Litigation Division

P.O. Box 12548

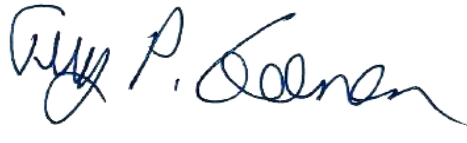
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ATTORNEYS FOR DEFENDANT

THE UNIVERSITY OF TEXAS AT AUSTIN

By: 
Terry P Gorman, Esq.